Pest Management Advisory Committee

Urban Pest Management Working Group

Notes for the meeting of
January 29, 2007

1. Attendance

Robert Baker, Pest Control Operators of California
Nasser Dean, Western Plant Health Association
Mary Lou Flint, University of California (UC IPM Statewide Program)
Jerry Howard, California Agricultural Commissioners
Tom Mumley, San Francisco Bay regional Water Quality Control Board
Laurie Nelson, Consumer Specialty Products Association
Peter Price, California League of Conservation Voters
Jennifer Ryder Fox, California State University, Chico
Dave Tamayo, California Stormwater Quality Association
Jerry Troyan, Tri-TAC (represents publicly owned treatment works, POTWs)

DPR

Mary-Ann Warmerdam, Director
Mark Rentz, Deputy Director
Jerry Campbell, Assistant Director
Nita Davidson, Senior Env. Research Scientist, Pest Mgmt and Licensing Branch

2. Introductions and Review of the Agenda

- Director will discuss with group its charge and work product.
- Working Group (UPMWG) will brainstorm pest management challenges associated with non-agricultural (urban) settings.
- Decide whether additional expertise/members would be beneficial to working group at this time.
- Discuss whether to retain an outside facilitator.

3. Director's Overview

- Historically, DPR has focused its resources (staff and dollars) primarily on agriculture and synthetic pesticide use.
- Rapid population growth (7–9 million in next 10–20 years) will likely affect DPR's priorities.
- More of DPR's resources will be focused on non-agricultural pest management and pesticide use.
- Situation is not unique to DPR—other agencies experiencing similar demands.
- Pest Management Advisory Committee (PMAC), based on the work of its Pest Management in the 21st Century Working Group (PM21), recommended that DPR "expand the department's efforts to address urban pest management."
- Given the complex nature of this undertaking (e.g., number of users, products and active ingredients; variety of uses; accessibility to pesticide products; and various affected governmental constituencies), the strategies the UPMWG

may want to focus on might be quite different from the conventional approaches we have used in the agricultural setting.
- Need to look beyond replacing one pesticide with another and ask ourselves how we can modify peoples' behavior toward pest management in non-agricultural settings.
- Think creatively—Consider how you might approach this challenge absent DPR's existing regulatory authorities and mandates.

4. Director's Charge to the Working Group

- Develop a set of recommendations for the PMAC's consideration designed to assist DPR address pest management challenges in nonagricultural settings.
- Identify opportunities for DPR to leverage its resources through coordination with and integration of ongoing urban pest management partnerships.
- Recommend innovative partnerships with local, regional, state and federal agencies, business entities, academia, and non-governmental organizations.
- Identify opportunities to integrate the applicable recommendations of the PMAC's Pest Management in the 21st Century Working Group into this effort. **See Attachment A**.
- Finalize and submit your recommendations to the PMAC by **no later than November 1, 2007**.
- Present your findings to the PMAC at its Fall 2007 Meeting **(November 15)**.

5. **Initial Brainstorming**

- California's increasing urban population—paradox associated with increased pesticide use:
  - Potential increased environmental impacts, and at the same time
  - Increased demand for sanitary conditions and pest control.
- Modifying people's behavior and perspective toward pest management is a critical component for an urban pest management strategy:
  - Increase people's awareness of potential environmental impacts associated with improper pesticide use (understanding of the label).
  - Increase awareness of IPM practices (including housing agencies).
- Comments from Publicly Owned Treatment Works representative (POTWs, sewage facilities):
  - Requirements of Non-Point Discharge Elimination System (NPDES) permits under Clean Water Act (CWA)—limits on levels of contaminants in effluent, including pesticides.
  - Potential lawsuits and civil penalties (up to $25,000 per day).
  - Constraints on operations through Total Maximum Daily Load (TMDL) implementation plans.
  - Capabilities of POTWs vary depending on age, growth and resources.
  - Limited technology and resources to remove pesticides from effluent.
  - Contaminant concerns not limited to pesticides.
- Comments from Stormwater Agencies representative:
  - Also must comply with terms of NPDES permits. Subject to similar penalties.

  - In most cases, stormwater is not treated at a facility before it is returned to the natural hydrologic system.
  - Limited resources and difficult to manage the chemical composition of stormwater given the extensive potential sources of stormwater runoff and no central treatment facility.
  - Installation of stormwater treatment facilities is cost prohibitive in most cases.
  - Contaminant concerns not limited to pesticides.
- Comments from Water Board representative:
  - Under federal CWA and California's Porter–Cologne Water Quality Act, State and regional water boards obligated to ensure water quality objectives are met and no significant adverse impact on beneficial uses of water.
  - Regulatory obligations include NPDES permit program (includes POTWs and stormwater permits).
  - Concern that some of the more aggressive environmental groups are positioning themselves for litigation pertaining to exceedances of water quality standards associated with urban waters.
  - TMDL program is evolving and is looked at as one of the water boards' primary tools to achieve water quality standards.
  - Looking for opportunities to partner with agencies, business community, and academia to develop *preventive* approaches to address water quality standards before impairments occur (as well as those impairments that already exist). *Must demonstrate progress to water boards*.
  - Pyrethroids: Key starting point is good analytical practices. Need to learn lesson that replacing one set of pesticide products and active ingredients (organophosphates) with another (pyrethroids), may not resolve water quality concerns but rather shift problems (e.g., from water column to sediment in the water course).
  - The problems facing POTWs and stormwater districts exist for other urban sectors, too.
  - Key is to identify main contaminant groups and the most effective ways to prevent and mitigate them.
  - Public education and communication provides a very valuable opportunity to change behavior (e.g., eliminating the dumping of used oil down sewer drains).
  - Although educating people and industry can take a long time, it's probably cheaper and more effective than some other approaches.
  - Gaining better insight as to the sources of contamination, so need to distinguish among the different factions—professionals, consumers, and government agencies and develop strategies to address each—or those of greatest impact.
- Comments of the Agricultural Commissioner representative:
  - Need an efficient process for prioritizing uses and user groups, both in terms of risk to the environment and effective results.

    - For example, a preliminary assessment in Solano County indicates more than 1,400 individuals or companies that may be providing landscape pest management who may not be licensed by the state.
- Comments by the University of California representative:
    - We may want to address other areas besides water quality (e.g., air quality and human exposure).
    - We may want to identify opportunities for DPR to improve its use data to provide a more accurate portrayal of pesticide use in the urban setting (uses, categories of users, products used).
- Comments of the Consumer Specialty Products representative:
    - Need to recognize that there are public health concerns/requirements, beyond resource protection, that obligate facilities, businesses, or government agencies to undertake specific pest management actions. For example, public health facilities (e.g., hospitals, nursing homes, clinics) have mandated health criteria they must satisfy. It holds true for food retailers, whether it's a grocery store or restaurant. At same time, those parties must consider costs/bottom line.
    - Need to consider costs and trade-offs associated with changing pest management practices.
- Comments from Pest Control Operator representative:
    - Services provided as driven by the customer, i.e., their expectations in terms of end result. Such expectations will not change overnight. Involves long-term education and communication.
    - While PCOs can provide an array of pest management services or practices, if customer's expectations aren't satisfied the customer will look elsewhere.
    - Residential customers are buying convenience and expediency. They want the problem taken care of immediately and often buy others (i.e., PCOs).
    - Focus on managing pests preventively, may involve additional costs to customers.
- Comments from California State University representative:
    - Rather than reinventing the wheel, we should look for successful education and outreach models—e.g., DPR's school IPM program
    - We should clarify our definition of IPM (although we shouldn't spend much time on this!)—at least we should issue a disclaimer that our group's IPM definition was developed by the PM21 working group.
- Additional comments and considerations:
    - Education and communication strategies will be a critical component of any successful effort.
    - Look for opportunities to reach consumers at the point-of-sale.
    - Should we come up with a mutually agreeable definition of integrated pest management (IPM)? **See Attachment B**, IPM definition from the PM21 Working Group Recommendations.
    - Should we consider health issues associated with pesticide use as well as water quality issues?

  - What opportunities exist to leverage DPR's resources through integration of existing urban pest management efforts and programs?
  - What are the opportunities for innovative partnerships with other local, regional, state and federal agencies? Business entities? Nongovernmental organizations?
  - What are the opportunities to better inform and educate urban pesticide users about reduced-risk pest management practices, including IPM?
  - What are the possible incentives to further advance IPM in the urban setting?

- Tactical Questions:
  - Should we add others to the Working Group? **NOTE:** Working Group agreed to hold this in abeyance until discussed potential sources at next meeting and then determine what additional representation may benefit the group.
  - Do we need to use a facilitator? **NOTE:** Group agreed to use a facilitator if DPR wants to pursue one. Further research by DPR staff revealed excessive time and paperwork required to contract facilitator. **Recommendation to Working Group**: Forego facilitator.
  - Should we dedicate individual meetings to different groups, e.g., public housing, landscaping, health care facilities? **NOTE:** Group deferred taking action on this until further to explore priority issues, concerns, and opportunities.

ATTACHMENT A

List of Recommendations from the PMAC's Pest Management in the 21st Century Working Group (Applicable to Nonagricultural Settings)

- Coordinate DPR pest management programs with those of other agencies, industries and organizations to achieve pest management, environmental and human health objectives most efficiently and effectively.
- Advance an IPM strategy that includes a vibrant research program that is continually expanding and improving IPM practices, communication, education and marketing strategy, and incentives to encourage voluntary investments in IPM practices.
- Include a mandatory, ecologically based IPM component as part of the continuing education requirements for PCAs, PCOs, and other licensees.
- Develop a voluntary IPM certification program for PCOs and PCAs.
- DPR should review its restricted materials permitting process to ensure that adequate consideration is given to alternative pest management practices.
- Use state licensing and county registration processes to educate, in appropriate language, maintenance gardeners and other licensees on IPM, runoff reduction, and as appropriate, drift prevention.
- Promote a statewide urban IPM strategy that includes:
    - Multilingual education on IPM practices for targeted audiences at the local level.
    - Partnerships with local media, government, agricultural commissioners, business and trade associations, nongovernmental organizations, and academia to promote IPM programs.
    - Coordination with existing IPM groups.
    - Point-of-sale information approved by DPR, on pest management alternatives, proper use of pesticides, and disposal of unused pesticides.
    - Incentives to encourage licensed PCOs, PCAs and residential users to use IPM practices.
- Evaluate the feasibility of expanding the use of preformulated pesticide products.
- Develop retail-level mechanisms to restrict in-store access to high-risk consumer retail pesticides.
- Certify retailers who go above and beyond basic retail efforts to promote IPM.
- Work with local planning agencies to identify opportunities to address agriculture–urban interface challenges through existing zoning authorities.
- Develop a voluntary IPM Certification Program (build off existing efforts).
- Ensure adequate DPR and county agricultural commissioners' compliance, education and enforcement resources to address increasing urban pesticide sales and use.
- Evaluate adequacy of compliance, enforcement and education efforts to licensed urban pesticide users (e.g., maintenance gardeners).

ATTACHMENT B

IPM definition from the Pest Management in the 21st Century Working Group Recommendations:

> Integrated Pest Management (IPM) is defined as a sustainable approach to achieving pest management objectives that combines biological, cultural, physical and chemical pest management tools in a way that minimizes human health, environmental and economic risks. IPM programs should include pest monitoring to determine if pest action threshold have been exceeded and treatments are needed. When pesticides are used, IPM includes a reduced-risk pesticide use decision-making process to select the pesticide and application techniques that achieve the pest management objectives with the least potential impact on human health, non-target organisms and the environment.